

EXHIBIT C

From: Zula, Heidi
Sent: Thursday, June 10, 2021 8:32 AM
To: Witness Doe 1
Subject: RE: Response

Witness Doe 1

Your request for an independent witness is denied. Please see my previous emails. As I indicated yesterday, there will be another witness from the Human Resources Office present during the meeting so you will not be meeting with me alone regardless if you choose to have a union representative present. Please plan to be present at the meeting today at 11 AM at your office in the 410 Building. Your failure to participate in the meeting will result in the completion of the investigation without your input.

Thank you,
Heidi

From: Witness Doe 1
Sent: Wednesday, June 9, 2021 2:23 PM
To: Zula, Heidi <hzula@co.schuylkill.pa.us>
Subject: RE: Response

Heidi,

I am not sure what was not clear about my last two emails. **I am concerned about your impartiality** and retaliation that you may engage in as result of my claims. As such, I am renewing my previous statements. **I will not participate in a meeting or interview with just you**. Given the sensitive nature of the topic and what I have been through **I am not comfortable with having a union representative present. I am in no way am I abandoning my claims or my right to have this harassment investigated.** I am asking the County to address the concerns I raised in my emails related to Mr. Halcoveg and Mr. Hatter. I am also renewing my request yet again to receive a response to my reasonable accommodation request. Should the County refuse to do so, I will pursue all recourse against the County that I am entitled to under the law.

Also, you allege that I am not being treated differently. However, when Kathleen Gillespie reported an issue with Denise Gerchak and Angela Toomey, you were not the individual who conducted the interview. However, you were the witness. Kathleen was a union employee, like I, and unless I am mistake you are not a union steward or representative. As such, I am requesting I be treated equally or at the very least be provided legitimate reason that I am not permitted to have a witness of my own choosing?

Thank you,

From: Zula, Heidi
Sent: Wednesday, June 09, 2021 1:39 PM
To: Witness Doe 1
Subject: RE: Response

Witness Doe 1

In order to investigate the issue, I need to meet with you to discuss your allegations. Given that our scheduled meeting time for today has passed, I will reschedule our interview for tomorrow morning at 11:00 AM in your office at the 410 Building. As this is an employment meeting, you are directed to attend. Your AFSCME Staff Representative, Andrew Kozlosky, will be available to attend the meeting on your behalf if you elect to have a witness present. Your failure to participate in the meeting will result in the completion of the investigation without your input.

Thank you,
Heidi

From: Witness Doe 1
Sent: Wednesday, June 9, 2021 1:17 PM
To: Zula, Heidi <hzula@co.schuylkill.pa.us>
Subject: RE: Response

Heidi

My concerns are your impartiality and retaliation that you may engage in as result of my claims. As such, I am renewing my previous statements. I will not participate in a meeting or interview with just you. . Given the sensitive nature of the topic and what I have been through I am not comfortable with having a union representative present. I am in no way am I abandoning my claims or my right to have this harassment investigated. I am asking the County to address the concerns I raised in my emails related to Mr. Halcovage and Mr. Hatter. I am also renewing my request yet again to receive a response to my reasonable accommodation request. Should the County refuse to do so, I will pursue all recourse against the County that I am entitled to under the law.

Thank you,

From: Zula, Heidi
Sent: Wednesday, June 09, 2021 1:09 PM
To: Witness Doe 1
Subject: RE: Response

Witness Doe 1

You are not being treated differently than any other union-covered employee. As a union-covered employee, you may elect to bring a union representative or steward as a witness to an employment meeting in which you believe that disciplinary action may be taken against you. As I am attempting to interview you regarding the claims that you made, I believe it is reasonable to assume that disciplinary action against you will not be the results of my interview. Although it is not necessary for me to provide you an opportunity to bring a witness to this type meeting, I am extending that courtesy to you given your claims. Please advise if you would like to have the meeting this afternoon at 1:15 with or without your union representative or steward present as originally

scheduled or if you would like to reschedule it for tomorrow morning so that I can arrange for your union representative to be present on your behalf.

Thank you,
Heidi

From: Witness Doe 1
Sent: Wednesday, June 9, 2021 1:01 PM
To: Zula, Heidi <hzula@co.schuylkill.pa.us>
Subject: RE: Response

Heidi

I don't understand why I am being treated differently than other County employees who have been permitted to bring independent witnesses to meetings. Given the sensitive nature of the topic, what I have been through, and the retaliation that you and others have engaged in thus far, I am not comfortable with a union steward, meeting with you alone, or with Andrew Kozlosky. Can you please provide a legitimate reason that I am not permitted to have a witness of my own choosing?

Please understand that in no way am I abandoning my claims or my right to have this harassment investigated. I am asking the County to address the concerns I raised in my emails related to Mr. Halcavage and Mr. Hatter. I am also renewing my request yet again to receive a response to my reasonable accommodation request.

Thank You

From: Zula, Heidi
Sent: Wednesday, June 09, 2021 12:48 PM
To: Witness Doe 1
Subject: RE: Response

Hi Witness Doe 1

Unfortunately, the only witness you would be entitled to bring to the meeting would be your union representative or a union steward. If you do not feel comfortable with a steward serving as your witness, I could contact Andrew Kozlosky as the AFSCME representative to determine if he could sit in on the meeting. I will be meeting with him tomorrow on another matter so I can see if he would be available to stay if you would be available around 10:30 AM or 11:00 AM tomorrow. Would that work? I really need to meet with you this week so that I can complete my investigation. Please advise how you would like to proceed.

Thank you,
Heidi

From: Witness Doe 1
Sent: Wednesday, June 9, 2021 12:34 PM
To: Zula, Heidi <hzula@co.schuylkill.pa.us>
Subject: RE: Response

Hi Heidi,

I'm not comfortable with a union steward because of the sensitivity of all that is going on. I would like an unbiased witness of my choosing. Please advise if the meeting will still take place at 1:15?

Thank You

From: Zula, Heidi
Sent: Tuesday, June 08, 2021 1:36 PM
To: Witness Doe 1
Subject: RE: Response

H^{Witness Doe 1}

I would be available to meet around 2:30. Does that work for you? I can come to your office in the 410 building for the meeting. I would like to discuss your email regarding your meeting with Kent Hatter as well as your sighting of George Halcovage on Thursday, June 3. I will be bringing a staff member from my office to observe the meeting. If you would like to have a witness present, you can ask a union steward to be present if you desire.

Thanks,
Heidi

From: Witness Doe 1
Sent: Tuesday, June 8, 2021 12:27 PM
To: Zula, Heidi <hzula@co.schuylkill.pa.us>
Subject: RE: Response

Hi Heidi,

Thank you for your response. I can meet with you anytime after 1 p.m. Please let me know what time works for you also please confirm where you would like to meet and what we will be discussing.

Thank You,
Marcy

From: Zula, Heidi
Sent: Tuesday, June 08, 2021 10:27 AM
To: Witness Doe 1
Subject: RE: Response

Witness Doe 1

Your personal emails did go to my Spam folder, but I was able to retrieve them last evening. I would like to schedule a time to discuss the information with you as I have some questions. I would also like to discuss the information that was provided last week regarding your sighting of George Halcovage on the highway. I need to visit your office so that I can understand what you saw. Will you have time this afternoon to meet?

Thank you,
Heidi

From: Witness Doe 1
Sent: Tuesday, June 8, 2021 10:24 AM
To: Zula, Heidi <hzula@co.schuylkill.pa.us>
Subject: Response

Hi Heidi,

I am still waiting on a response from you regarding the emails I sent to you yesterday. When can I expect a response?

Thank You,

Witness Doe 1